

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:	§	Chapter 11
	§	
JOANN INC., et al.,	§	Case No. 25-10068 (CTG)
Debtors	§	(Joint Administration Requested)

**NOTICE OF APPEARANCE AND
REQUEST FOR SERVICE OF NOTICES AND PAPERS**

PLEASE TAKE NOTICE that the undersigned hereby appear on behalf of Birch Run Station, LLC, an Arizona limited liability company, and demand, pursuant to Rules 2002, 9007 and 9010(b) of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Sections 1109(b) and 342 of Title 11 of the United States Code, as amended, that all notices given in the above-captioned cases and all papers served or required to be served in the above-captioned cases be given to and served upon the undersigned attorneys, at the address set forth below:

Birch Run Station, LLC
c/o Timothy T. Mitchell, Esquire
Rashti and Mitchell, Attorneys at Law
4422 Ridgeside Drive
Dallas, Texas 75244
(972) 661-9471
tim@rashtiandmitchell.com
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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only notices and papers referred to in the Bankruptcy Code or Bankruptcy Rules, but also includes, without limitation, orders and notices of any applications, motions, orders, demands, hearings, requests or petitions, answering or reply papers, memoranda and briefs in support of any of the foregoing, and any other document brought before this Court with respect to the Bankruptcy

Case, whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, hand delivery, telephone, facsimile, telex, e-mail or otherwise.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim or suit is intended or shall be deemed to waive the Birch Run Station, LLC's (i) right to have final orders in non-core matters entered only after de novo review by a higher court; (ii) right to trial by jury in any proceeding so triable herein or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by the United States District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) other rights, claims, actions, defenses, setoffs or recoupments to which the Birch Run Station, LLC, is or may be entitled under agreements, at law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments expressly are hereby reserved.

Dated January 21, 2025.

**Respectfully submitted,
RASHTI AND MITCHELL**

/s/ Timothy T. Mitchell
Timothy T. Mitchell
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Dallas, Texas 75244
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tim@rashtiandmitchell.com
Attorneys for Birch Run Station, LLC

CERTIFICATE OF SERVICE

I, Timothy T. Mitchell, do hereby certify that a true and correct copy of the above NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF NOTICES AND PAPERS has been served upon the parties listed on the Court's ECF transmission list in this case on this 21st day of January, 2025.

/s/ Timothy T. Mitchell
Timothy T. Mitchell, **Attorneys for Birch Run Station, LLC**